

Message

From: Russel Honore' [russel.honore'
Sent: 7/18/2022 7:33:06 PM
To: Nance, Earthea [Nance.Earthea@epa.gov]; Vaughn, Gloria [Vaughn.Gloria@epa.gov]
Subject: Fwd: Hot Poisoned Water

fyi

----- Forwarded message -----

From: L YC <laurayco>
Date: Mon, Jul 18, 2022 at 1:47 PM
Subject: Fwd: Hot Poisoned Water
To: Russel Honore' <russel.honore'> nicolas holm <nicolas@ouutu.com>

FYI

----- Forwarded message -----

From: Michael Tritico <michaeltritic
Date: Mon, Jul 18, 2022 at 1:34 PM
Subject: Hot Poisoned Water
To: James Hiatt <james@labucketbrigade.org>, Naomi Yoder <naomi@healthygulf.org>, Raleigh Hoke <raleigh@healthygulf.org>, Jack Sweeney <jack@labucketbrigade.org>, MSW Cynthia P. Robertson <cindy@micah68mission.org>

Below is a rough first draft of what I hope to expand and deliver as comments in person at the LDEQ Public Hearing July 28, 6 P.M. at the Westlake City Council Chambers. I would hope that some of you would see that this is an important situation. Rhetorical testimonies make no difference to LDEQ. SOMETIMES fact-based testimonies force them to do something useful.

RESTORE

P.O. Box 233
Longville, LA 70652
(337)-725-3690

michaeltritic

xx/xx/xxxx

LDEQ Public Participation Group
P.O. Box 4313
Baton Rouge, LA 70821-4313

Re: AI Number 226602 Permit Number LA0127532 and Activity Number PER20210003Louisiana Integrated Polyethylene Joint Venture, LLC

Draft Water Discharge Permit and the Associated Environmental Assessment Statement

Dear Public Participation Group:

I have reviewed several relevant documents in EDMS, Numbers: 13308138 (177 pages), 13206067 (15 pages), 10981526 (4 pages), 11422056 (30 pages), 12885916 (7 pages), and 12540042 (316 pages.) I did NOT go back and review the underlying SASOL, Lyondell, and Basell documents although undoubtedly those records would have helped clarify what is happening and what could happen in the aftermath of the shifts in responsibilities underway.

Although this proposed permit covers 4 outfalls into Bayou Verdine and 2 into the Calcasieu River, I focused my reviews on the ones going into the river by Nalmar Landing. That is a very narrow part of the Calcasieu River just downstream from Lake Charles.

In previous proceedings I have pointed out that the hot water coming from that SASOL discharge creates a thermal curtain which cooks aquatic biota eggs, larvae, and juveniles that are passively carried into the hot zone. Furthermore the Outfall O81 and C81 thermal barrier either kills adult fish, crabs, and shrimp that are trying to migrate downstream or upstream to fulfill their life cycles or it blocks them - turns them around in final frustration of their instincts.

Despite my efforts to get LDEQ to investigate and address that serious environmental quality issue, now you are proposing to allow the problem to continue unmitigated. Apparently you have not even checked out the situation by simply sending a sampling team to do temperature profiling of the river.

This is a perfect example of the false promise to the public that LDEQ embodies.

Not having any limit on how hot the discharges from the outfalls can be is ridiculous. Even more absurd is the malfeasant charade included in the draft permit materials: "Mixing Zone Calculations" on PDF Pages 149 and 150 of EDMS Document Number 13308138. One of the factors in the formula is T_a , ambient temperature of the receiving stream, given as 95 degrees Fahrenheit year around! Applying that factor LDEQ calculates the allowable temperature of the effluent to be 210.98 degrees Fahrenheit! In other words, if there is not 212 degree boiling water flushing into the Calcasieu River at the City Docks, LDEQ blesses Louisiana Polyethylene Joint Venture, LLC and says "go to it!"

Contained in that 5 million gallons a day of hot water are almost a ton of toxic synthetic molecules a year, some of which are the same ones which led to Seafood Consumption Advisories that are still in existence. There are also many tons of eutrophication-inducing molecules, which not only distort the estuarine and riverine ecosystems but add to the "Dead Zone" problem that exists off the Louisiana to Texas coasts.

Sincerely,

Michael Tritico, Biologist and President of RESTORE

Restore Explicit Symmetry To Our Ravaged Earth

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Laura Cox
lauraycox@gmail.com
[512-587-8046](tel:512-587-8046)

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Best Regards,
Russel L. Honore'
LTG, U.S. Army (Retired)

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